

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.)No. 08 CR 374
)Mag. Judge Nan R. Nolan
VICTORIA MALUKAJTE)

NOTICE OF FILING

TO: Eric Hogstrom
Assistant United States Attorney
219 S. Dearborn St., 5th Floor
Chicago, Illinois 60604

Please take notice that on this 5th day of June, 2008, the undersigned filed the following document(s) in the above-captioned cause, a copy of which is attached hereto.

- DEFENDANT'S UNNOPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Respectfully submitted

FEDERAL DEFENDER PROGRAM
Terrence F. MacCarthy
Executive Director

By: s/Paul Flynn
Paul Flynn

PAUL FLYNN
FEDERAL DEFENDER PROGRAM
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DEFENDANT'S UNNOPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant VICTORIA MALUKAJTE, by the Federal Defender Program and its attorney, PAUL FLYNN, respectfully moves to modify her conditions of release on bond. In support of this motion the defendant states as follows:

1. On May 9, 2008 defendant was released on a \$50,000 dollar bond with ten percent to be posted as security. The court ordered several standard conditions of bond and some specific to Ms. Malukajte's situation. Among the additional conditions of bond ordered by this court was the condition that the defendant reside with her parent's, seek and maintain employment and that she abide by a 7:00 p.m. curfew.

2. Prior to the order Ms. Malukajte was employed doing clerical work at her parent's trucking firm. She was also employed part time as a model. Consistent with the order of the court Ms. Malukajte has re-enrolled in college, is

working at her parent's trucking firm and has continued modeling. Ms. Malukajte's agent is Derrick Dailey. His phone number is 312-860-0794. She is scheduled to model at a fashion show for Akira clothing tonight, June 5, 2008. The fashion show is at REM studios, 3511 W. Belmont Avenue, Chicago, Illinois, 60618. The show starts at 10:30 p.m. and ends at 12:00 a.m. Ms. Malukajte would further need approximately 1.5 hours to change after the show, clean up and drive home to her parents residence where she is residing pursuant to court order.

4. Ms. Malukajte respectfully requests of this court that she be allowed work tonight at the fashion show. Assistant United States Attorney Eric Hogstrom has no objection to this motion.

Respectfully submitted,

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Executive Director

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CERTIFICATE OF SERVICE

The undersigned, Paul Flynn, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CRIM. P. 49, FED. R. CIV. P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s) :

DEFENDANT'S UNNOPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on June 5, 2008, to counsel/parties that are non-ECF filers:

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